

Mr. John Charles Kenney
 Register No. 05238-041
 Allenwood USP
 P.O. Box 3000
 White Deer PA 17887-3000

Hon. Judge McClure, Jr.,
 (presiding)

Clerk / Cover Letter

(52)

Sunday, September 30, 2001

Dear, Ms. M. E. D'Adrea: (Clerk's Office)

RE: John Charles Kenney v. Jake Mendez, et al
 Case No. 1:CV-00-2143

In re: Documents In support of Procuring Pro
 Bono Representation By Plaintiff

Will you please incorporate by reference
 the (4) four-documents into the computerized
 (DK) docket-entry. These documents are purely
 in support of the Appointment Of Counsel
 motion recently filed by me. Due to my penury
 and isolated cell confinement, I was unable
 to provide opposing counsel copies - at this time.
 As a result, will you please process. Thank

you
 FILED
 WILLIAMSPORT, PA

SEP 28 2001

MARY E. D'ANDREA, CLERK
 Per Deputy Clerk

Respectfully submitted & requested,

By:

Kenney #05238-041

Mr. John Charles Kenney
 Register No. 05238-041
 Allenwood USP
 P.O. Box 3000
 White Deer PA 17887-3000

Phone: (570) 547-0963, ext. isolation 6630

INTRODUCTION

Sunday, September 30, 2001

DEAR, Ms. Wenger-Dincher: (Attorney At Law)

RE: Federal Prisoner Seeking "Pro bono" Representation

PLEASE let me briefly introduce myself my name is, John Charles Kenney, Register No. 05238-041. I'm a Federal Prisoner, currently incarcerated at U.S. Penitentiary, Allenwood, White Deer, PA 17887-3000. Located in Union County. I'm serving federally imposed sentences from three separate districts for being accused of violating 18 USC 2113(a)-(d). The ("BOP") Bureau Of Prisons has calculated my release date at October 26, 2016. I've been incarcerated just a little over a decade. Unfortunately, I was federally indicted on Nov. 10, 1999. (See Enclosure) (verdict slip reflecting). Mr. Jeffrey L. Dohrmann, of Williamsport, PA had represented me during a (9) nine-day trial by jury. I'm currently awaiting sentencing on count (3) three, a (disposable razor blade). Sentencing is scheduled for Oct. 26, 2001. As a result of an alleged 9/29/99 incident, which allegedly occurred here at Allenwood USP, which lead to me being indicted, where I was accused of the charges (reflected on the verdict-slip enclosed). That, I counterclaimed by filing a Civil Rights Complaint, pursuant to 28 USC 1331- on Dec. 22, 2000. My reasons for initiating the 1331 is, because, I was "violently" beaten by the employee, whom I was accused of attempting to assault. (See Enclosure) (reflecting injuries I sustained by the defendant employees).

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Attorney At Law
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Introduction Cont'd

Initially, I begun the 1331 Pro se in John Charles Kenney vs. Jake Mendez, Warden, et al., Civil Number: 1:CV-00-2143. I ^{was} granted leave to proceed in In Forma Pauperis by the Court. The case was originally assigned to Hon. Judge Rambo (Harrisburg, PA). Per, Defendants moved to have the case transferred to the Hon. Judge McClure, Jr. (Williamsport, PA). Hon. Judge Rambo by ORDER on Sept. 7, 2001, granted Dets' Motion to transfer the case. Dets on Sept. 7, 2001 per Court ORDER had answered my complaint. Due to my penury, limited legal knowledge, and my isolation-confinement, coupled with Defendants engaging in divagated and dilatory tactics all aimed at hindering my pursuit in the suit. Moreover, I also have a pending civil appeal, awaiting disposition from the Hon. Third Circuit U.S. Court Of Appeals in an unrelated case. Not to mention the thousands of documents in Mr. Dohrmann's possession deriving from (my) crim-case. These documents are related, and relevant to the 1331-case. Therefore, based on this its intrinsically beyond my pro se ability and/or capacity to pursue this case fairly. In other words, its impossible for me to keep up with this case based on that above.

MY REASONS FOR WRITING YOU

It is transcended upon me by obligation to make an effort to "vigorously" attempt to procure Pro Bono - Representation on my own, when seeking

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Reasons For Writing You Cont'd

appointment of counsel from the Court. Even though, I am financially unable to afford your representation. As a result, I can only seek your professional services based upon a contingency fee arrangement, or in the expectation of collecting attorney's fees from the defendants. Therefore, I kindly seek your representation pro bono, and based upon the above.

It should be noted that, I have "thoroughly" reviewed the facts of this civil case. Meaning this case has "substantial" merit in fact and law.

Also meaning this is a non-frivolous case. See Rayes v. Johnson, 959 F.2d 700, 703 (8th Cir. 1992). Pursuant to recent amendments of 42 USC 1997e(d)(B)(2) (Supp. II 1996) and 42 USC 1988(b) (Supp. II 1996) (A successful prisoner must remit a quarter of the award for attorney's fees). In the event that you're interested in this case, please notify me via correspondence, or call my Correctional Counselor, Mr. Oddo, at (570) 547-0963, ext 6344.

Concluding notation, if you write me back, please place on envelope "OPEN ONLY IN PRESENCE OF INMATE." Thank you so much for your time in reviewing this letter and its enclosures.

cc: jck

Respectfully submitted - requested,
 Kenny # 05238-041

Mrs. R. Wenger-Dincher
 Attorney At Law
 416 Pine Street, Ste. 308
 Williamsport PA 17701

ADVISEMENT

9/30/01

Dear, Mrs. Wenger-Dincher: (Attorney At Law)

Please be advised that, I am financially unable to afford postage to forward you portions of the (Ct) case civil file for your viewing. However, again if you, or any of your colleagues are interested in accepting (my) civil case pro bono contingent upon the merits and/or success of the case. I urge you to please contact my Correctional Counselor, Mr. L. Oddo, at (570) 547-0963, ext. 6344, Unit I-B. In order to arrange visiting, where I would be able to bring this material to the visiting-room for your viewing. The monetary sums, I'm seeking is 4-million-dollars for the physical injuries inflicted upon me by Defendants, 4-million-dollars ^{emotional injuries} deriving therefrom.

Shall you desire further information, please do not hesitate to contact me via telephone to my counselor, whom can set up phone arrangements. Thank you.

Respectfully submitted,

Kenny #05238-041

cc: jck

Mr. John Charles Kenny
 Register No. 05238-041